

REMARKS

Reconsideration and allowance of the present application are respectfully requested. Claims 1-5, 9-27, and 31-61 are currently pending in this application.

Entry of this Response Under 37 C.F.R. § 1.116 is Appropriate and is Respectfully Requested.

In the present Response, the subject matter of now withdrawn claims 6-8 has been incorporated into independent claim 1. The subject matter of now withdrawn claims 28-30 has been incorporated into independent claim 23. The other independent claims (i.e., claims 44, 52, and 57) have been amended in a related fashion. As the Patent Office has already searched and addressed the subject matter recited in claims 6-8 and 28-30, it is believed that the above amendments do not necessitate a new search, or raise any new considerations. Accordingly, entry of this Response is deemed appropriate and is respectfully requested.

Information Disclosure Statement

An Information Disclosure Statement is submitted herewith. This Information Disclosure Statement lists two references that were cited by the Patent Office in an Office Action dated July 18, 2003 in U.S. Application Serial No. 09/632,662. The Examiner is respectfully requested to indicate consideration of these two references by initialing the Form PTO-1449 attached thereto, and forwarding a copy of the initialed Form to Applicant.

1 *Withdrawal of the Rejection Under 35 U.S.C. 102(b) is Appropriate and is*
2 *Respectfully Requested.*

3 Claims 1-21, 23-45, 52, and 57 were rejected under 35 U.S.C. § 102(b) as being
4 anticipated by U.S. Patent No. 5,191,645 to Carlucci et al. (referred to below as
5 “Carlucci”). Applicant respectfully traverses this rejection for the following reasons.

6 As amended, independent claim 1 recites a video output system for producing
7 video signals within a video graphics workstation. The video output system comprises: a
8 receiver for receiving a video signal forwarded from a video signal source within the
9 video graphics workstation; a video pipeline for post-processing the received video
10 signal, the video pipeline producing a post-processed video signal; and a video output
11 module for converting the post-processed video signal, the video output module
12 producing a formatted video signal. The claim has been amended to recite that: the video
13 output system is selectively coupled to a storage medium as one video signal source; the
14 video output system is selectively coupled to a video graphics processor as another video
15 signal source; and the video output system is selectively coupled to a video input system
16 as another video signal source. Fig. 1 of the instant specification shows one exemplary
17 and non-limiting system encompassed by the subject matter recited in claim 1. The
18 workstation 100 shown in that figure includes a video output system 140 that is
19 selectively coupled to a video graphics processor 130, a storage medium 120, and a video
20 input system 110. One exemplary benefit of the design strategy shown in Fig. 1 is its
21 scalability, which enables it to adapt to the changing needs of the workstation’s user.

22 Carlucci does not teach or suggest the above-described recitations of claim 1. As
23 the prior Response of May 21, 2003 provided a general description of the Carlucci
24 reference, this Response will directly advance to an explanation of the deficiencies of the
25 Carlucci reference vis-à-vis the rejected claims.

1 The Office Action now interprets the claimed "receiver" as Carlucci's input
2 processor 70, the claimed "video pipeline" as Carlucci's digital signal processor 72, and
3 the claimed "video output module" as Carlucci's output processor 74. In an apparent
4 alternative interpretation, the Office Action also interprets the claimed "receiver" as
5 Carlucci's filter 100 of the input processor 70, the claimed "video pipeline" as Carlucci's
6 A/D converter 102 of the input processor 70, and the claimed "video output module" as
7 Carlucci's frame buffers (104, 106, 108) of the input processor 70. However, this
8 interpretation is misplaced because Carlucci pertains to a markedly different system than
9 the invention recited in claim 1. For instance, claim 1 recites that the receiver of the
10 video output system receives a "video signal forwarded from a video signal source within
11 the video graphics workstation." Further, the claim now explicitly states that the video
12 output system is selectively coupled to: a storage medium as one video signal source; a
13 video graphics processor as another video signal source; and a video input system as
14 another video signal source. Carlucci does not disclose at least the above-described
15 features. For instance, Carlucci's input processor 70 (which is being interpreted by the
16 Office Action as the recited "receiver") receives an analog input signal only from a
17 camera processor 12. Camera processor 12, in turn, functions by imaging film frames
18 adjacent to it (column 3, lines 51-53 of Carlucci). Accordingly, the input processor 70 is
19 clearly not selectively coupled to a storage medium, video graphics processor, and a
20 video signal source. For instance, the camera processor 12 functions neither as a storage
21 medium nor as a video graphics processor. As mentioned above, the Patent Office has
22 alternatively interpreted the claimed "receiver" as the filter 100 (shown in Fig. 3) of the
23 input processor 70. Again, however, the filter 100 is clearly not selectively coupled to a
24 storage medium, video graphics processor, and a video signal source; it is only coupled to
25 the camera processor 12.

1 In addressing the above-noted features of claim 1 (formally recited in withdrawn
2 claims 6-8), the Office Action also generally directs the Applicant's attention to Figs. 3
3 and 4 of Carlucci. These figures show two different respective implementations of the
4 input processor 70. Since the input processor 70 is itself what is being construed as the
5 claimed "receiver," these figures do not show any components that function as a source X
6 of information that is fed to the receiver. For instance, it is true that these figures show
7 memory (e.g., buffers 104, 106, 108). But this memory does not constitute a storage
8 medium or a video graphics processor that feeds information to the receiver of the video
9 output system (which the Office Action is interpreting as Carlucci's input processor 70
10 and/or the filter 100 of the input processor 70). In other words, the output of the buffers
11 (104, 106, 108) is not fed to the input of the input processor 70 or filter 100.

12 A claim is properly rejected under 35 U.S.C. § 102 only if each and every element
13 of the claim is found in the cited reference. For the above-identified reasons, Carlucci
14 does not disclose each and every element of claim 1 – and quite to the contrary, describes
15 a markedly different system than the invention recited in claim 1. Accordingly, the
16 Applicant respectfully requests that the rejection of claim 1 under 35 U.S.C. § 102 be
17 withdrawn. Independent claims 23, 44, 52, and 57 recite related subject matter to claim
18 1, and are therefore allowable for similar reasons to those specified above.

19 The remaining claims rejected under 35 U.S.C. § 102(b) (i.e., claims 2-5, 9-21,
20 24-27, 31-43, and 45) depend variously from claims 1, 23, and 44, and are therefore
21 allowable for at least this reason. In addition, these claims recite additional features that
22 are not taught or suggested by Carlucci. For instance, claims 10-21 recite various X
23 functions involved in the process of post-processing performed by the claimed "video
24 pipeline." Again, the Office Action is interpreting the claimed "video pipeline" as either
25 Carlucci's digital signal processor 72 or Carlucci's A/D converter 102. Neither of these

1 components performs all of the functions identified in claims 10-21. For instance, with
2 respect to claim 10, the Office Action identifies column 12, lines 32-38 of Carlucci as
3 disclosing region of interest selection (page 3, lines 16 and 17 of the Office Action).
4 Even if, assuming *arguendo*, that this passage describes the subject matter of claim 10,
5 this passage is describing the functionality of the output processor 74, not the digital
6 signal processor 72 (again, which the Office Action is interpreting as the claimed “video
7 pipeline”). With respect to claim 11, the Office Action identifies column 6, lines 25-37
8 of Carlucci as disclosing frame rate matching (page 3, lines 18-21 of the Office Action).
9 However, that portion is describing functionality of the input processor 70, not the digital
10 signal processor 72. These are merely two illustrations of the deficiencies of the Carlucci
11 reference vis-à-vis the claimed invention.

12 For at least the above-stated reasons, the Applicant submits that the 35 U.S.C.
13 § 102(b) rejection based on Carlucci is misplaced, and respectfully requests that it be
14 withdraw.

15
16 *Withdrawal of the Rejections Under 35 U.S.C. § 103 is Appropriate and is*
17 *Respectfully Requested.*

18 Claim 22 was rejected under 35 U.S.C. § 103 as being unpatentable over Carlucci
19 in view of U.S. Patent No. 5,937,173 to Olarig et al. (referred to below as “Olarig”).
20 Applicant respectfully traverses this rejection for the following reasons.

21 Claim 22 depends on independent claim 1, and is therefore distinguishable over
22 Carlucci for at least this reason. Olarig also does not disclose the subject matter of
23 independent claim 1 identified above. Therefore, Olarig does not make up for the
24 deficiencies of Carlucci, whether considered alone or in combination with Carlucci. The
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1 Applicant therefore respectfully requests that the U.S.C. § 103 rejection based Carlucci
2 and Olarig be withdrawn.

3 Claims 46, 47, 49, and 50 were rejected under 35 U.S.C. § 103 as being
4 unpatentable over Carlucci in view of U.S. Patent No. 5,734,589 to Kostreski et al.
5 (referred to below as "Kostreski"). Applicant respectfully traverses this rejection for the
6 following reasons.

7 Claims 46 and 47 depend on independent claim 1, while claims 49 and 50 depend
8 on independent claim 23. These claims are therefore distinguishable over Carlucci for at
9 least this reason. Kostreski also does not disclose the subject matter of independent
10 claims 1 and 23 identified above. Therefore, Kostreski does not make up for the
11 deficiencies of Carlucci, whether considered alone or in combination with Carlucci.

12 Kostreski also fails to disclose the subject matter recited in claims 46, 47, 49, and 50, whether considered alone or in combination with Carlucci. For instance, claim 46
13 50, whether considered alone or in combination with Carlucci. For instance, claim 46
14 recites that the receiver and the video pipeline are implemented as an integrated video
15 processing module, and that the video output module is detachably coupled to the video
16 processing module. Claim 47 specifies that the video output module is a daughterboard
17 module that couples to the video processing module. As referenced in the Office Action,
18 Kostreski discloses a network interface module 101 that takes the form of a plug-in
19 module, similar to a daughterboard or option card which can be plugged into a back plane
20 of a personal computer (column 9, lines 1-4 of Kostreski). While Applicant certainly
21 does not contend that daughterboards are novel *per se*, the use of a daughterboard
22 arrangement in the context of the claimed invention is non-obvious over the applied
23 references. For instance, the Office Action is interpreting Carlucci's output processor 74
24 as the claimed "video output module." Carlucci's output processor 74 is shown in Fig. 2
25 as being a functional component within a film scanning processor 14. There is no

1 suggestion in Carlucci that it would have been desirable or obvious to make any
2 component within the film scanning processor 14 detachable from the remainder of the
3 film scanning processor 14. Further, Kostreski's network interface module 101 provides
4 physical connection to a particular type of network, and therefore is not relevant to the
5 film processing technical environment associated with Carlucci's film scanning processor
6 14.

7 The basis on which claims 48 and 51 are rejected is not clear from the Office
8 Action. It is assumed that the Patent Office intended to reject these claims based on the
9 combination of Carlucci and Kostreski. With respect to these claims, the Office Action
10 states that "it is well known in the art to inform of a configuration of any detachable
11 module to the main processor (CPU common on the mother board) so as to make and
12 utilize an operational piece of hardware/ software" (page 6, second paragraph of the
13 Office Action). The Applicant traverses this rejection because there is no support in the
14 record for the conclusion that the identified features are "well known." In accordance
15 with MPEP § 2144.03, the Examiner must cite a reference in support of this Office
16 Action's position.

17 Likewise, the basis on which claims 53-56 and 58-61 are being rejected is not
18 clear. Presumably, these claims are being rejected under 35 U.S.C. § 103 based on
19 Carlucci. Insofar as these claims recite subject matter found in prior claims, the
20 Applicant respectfully traverses this rejection for the reasons provided above. Moreover,
21 the rejection of a claim such as 54 highlights the overreaching nature of the Office
22 Action. This claim specifies that the "video pipeline" includes functionality for
23 performing no fewer than nine functions specified in claim 53. The Office Action is
24 interpreting the claimed "video pipeline" as Carlucci's digital signal processor 72. This
25 component, as shown in Fig. 5 of Carlucci, includes three functional modules: noise

1 reducer 80; color processor 82; and image enhancer 84 – not the nine functions recited in
2 claim 53.

3 For at least the reasons specified above, the Applicant respectfully requests that
4 the U.S.C. § 103 rejection based Carlucci and Kostreski be withdrawn.

5
6 *Conclusion*

7 In conclusion, the Applicant respectfully requests that the rejections based on 35
8 U.S.C. § 102 and 35 U.S.C. § 103 be withdrawn.

9 As a final matter, to clarify the record, the arguments presented above are not
10 exhaustive; Applicant reserves the right to present additional arguments to fortify its
11 position. Further, Applicant reserves the right to challenge the prior art status of one or
12 more documents cited in the Office Action.

13 All objections and rejections raised in the Office Action having been addressed, it
14 is respectfully submitted that the present application is in condition for allowance and
15 such allowance is respectfully solicited. The Examiner is urged to contact the
16 undersigned if any issues remain unresolved by this Amendment.

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18 Respectfully Submitted,

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21 By: David M. Huntley

22 David M. Huntley
23 Reg. No. 40,309
24 (509) 324-9256
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